

LAW OFFICE OF KENNETH G. WALSH

100 S. Bedford Road, 3rd FL.
Mt. Kisco, New York 10549
(929) 241-7307

July 9, 2019

Via ECF

Magistrate Judge James Orenstein
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Stevens Baldo & Lighty, PLLC v. Anthony J. Delluniversita et al.*,
2:18-CV-1600-MKB-JO (E.D.N.Y.)

Dear Judge Orenstein:

Late last night, I received an email from Lyn Stevens of Stevens Baldo & Lighty, PLLC advising me that he is no longer available for his deposition on July 26, 2019. He is available on July 29, 30 or 31. We apologize for this confusion. Mr. Stevens has recently returned to work after losing his wife to cancer.

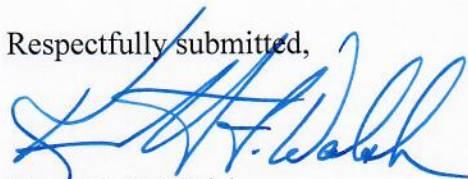
I would also like to clarify some things that were omitted from Anthony P. Delluniversita's letter of July 8, 2019, [D.E. 110] which I believe are highly relevant to the Court's determination of the deposition schedule. Yesterday, Attorney Delluniversita confirmed that Gail A. Delluniversita ("Gail") was been filtering Anthony J. Delluniversita-Judgment Debtor's funds through her account at Chase. See attached email correspondence from Attorney Delluniversita confirming that the Judgment Debtor deposits funds into an account controlled by Gail. This is alleged in the Second Amended Complaint at ¶ 82. D.E. 55. Prior to commencing this action, Plaintiff's investigator could not find any accounts in the Judgment Debtor's name. The investigator found Gail's Chase account. It now appears that the Judgment Debtor's name may have been taken off this account.

Contrary to Attorney Delluniversita's representations to the Court, Gail only produced copies of her Chase account statements for the period of December 14, 2012 to May 13, 2015—while the Malvino Action was pending. Gail produced nothing post Judge Ramos's May 20, 2015 Findings of Fact and Conclusions of Law in the Malvino Action which found the Judgment Debtor liable for defrauding Bonnie Perieda. Plaintiff wanted to have a meet and confer with Attorney Delluniversita on this improper limitation, but he refused to make himself available. Otherwise, there would have been a motion to compel Gail's production before the Court on July 2, 2019, in addition to the motions pertaining to the Judgment Debtor and Paul A. Delluniversita's productions. Both of which, the Court granted in Plaintiff's favor.

In light of this recent relevant disclosure, the nature of the claims—fraudulent conveyances by the Delluniversita family to strip PCA Collectibles, Inc. of its assets and their

efforts to make Anthony J. Delluniversita judgment proof and Mr. Stevens unavailability on July 26, the schedule should be altered by one business day: Gail A. Delluniversita's deposition should be ordered to proceed on July 26, 2019 and Lyn Stevens' deposition should proceed on July 29, 2019.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "K. G. Walsh", is written over the typed name. The signature is fluid and cursive.

Kenneth G. Walsh

EXHIBIT A

Kenneth Walsh

From: anthony@apdlaw1.com
Sent: Monday, July 8, 2019 4:06 PM
To: Kenneth Walsh; Anthony DellUniversita
Subject: RE: Stevens Baldo & Lighty, PLLC v. Anthony J. Delluniversita et al.,
Attachments: letter to court with deposition schedule.docx

here you go. you already have the accounts you want. There is no money laundering, Anthony J. does not maintain individual bank accounts as he is recovering gambling addict and does not want that control over any finances. He deposit the money in the joint account that only gial can withdraw from. Get your facts straight before you open your mouth. You are unreasonable. You have what you asked for.

Please note my new office address below.

Anthony P. DellUniversita
A.P. Delluniversita & Assoc., LLC
2 West Main Street
Suite SE3
Bay Shore, New York 11706

(631) 251-7570 (Direct)
(833) 201-1170 (Toll Free)
(631) 678-7515 (Cell)
(833) 245-6690 (Fax)

anthony@apdlaw1.com
apd@alberlaw.com

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----- Original Message -----

Subject: RE: Stevens Baldo & Lighty, PLLC v. Anthony J. Delluniversita et al.,
From: "Kenneth Walsh" <kwash@kgwalshlegal.com>
Date: 7/8/19 3:53 pm
To: "anthony@apdlaw1.com" <anthony@apdlaw1.com>, "Anthony DellUniversita"